



Stakeholder Responses to PJM Legal Questions

PC Special Session – CIRs for ELCC
January 21, 2022

- Question #1:
- To the extent the proposed revisions to the deliverability requirements for wind and solar resources specified in Manual 14B, Attachment C: PJM Deliverability Testing Methods could result in the identification of additional transmission upgrades (e.g., to provide for increased deliverability or address reliability needs, etc.), what is the appropriate means by which to assign cost allocation responsibility for those additional transmission upgrades?

For Discussion: Question 1 Responses/Themes

Assigning a resource with an already executed ICSA and ISA the costs of additional network upgrades that were identified in some future period as the result of changing study methodologies runs afoul of several contractual and regulatory principles.

There are precedents from other ISOs changing dispatch assumptions in the interconnection queue processes without requiring existing or ISA generators to go back to the study phase –this is a fundamental principle of the interconnection rights.

Continue practice of applying new/modified RTEP testing criteria and procedures first to baseline studies that drive Baseline projects and only then to interconnection studies that drive Network projects

Deliverability requirements and tests can only be made on a prospective basis

Support for shared cost allocation responsibility for additional upgrades

It is inappropriate for PJM to ask stakeholders for legal analysis of its Tariff.

Each of these two types of RTEP projects that result from these two types of studies should continue to be cost allocated using their respective, already-established, cost allocation procedures in the PJM Tariff.

Question #2:

- To the extent that the transmission upgrades identified by the proposed revisions to the deliverability requirements for wind and solar resources specified in Manual 14B, Attachment C could result in an increase in a generation unit's deliverability within the PJM Control Area, what is the appropriate treatment of that deliverability, based on applicable FERC precedent, policy, and the PJM tariff.

Establish CIRs based on interconnection studies at time of initial time of interconnection

Increased deliverability should only be granted if generator goes through queue process

Support for CIRS to select up to the maximum expected summer net output when transmission upgrades increase the generation unit's deliverability

If RTEP is used to solve the newly identified shortfalls as posed by Question #1, the additional mw should be available to any participant.

The status quo is the most appropriate way to address the treatment of mis-accreditation of certain intermittent Generation Capacity Resources

Requiring existing/ISA resources to re-enter the queue to maintain current levels of deliverability is definitely not desirable.

Further exacerbating the existing backlog in the queue should be avoided.

- Two additional meetings scheduled:
 - February 15 – Final walk through of solution proposals
 - February 23 – General review of analysis and potential impacts from generator deliverability testing and CIR modifications
 - Non-binding poll for CIR solution proposals to open afterwards
- March PC – Target date for first read of solution proposal(s)

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